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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

RHONDA CORA MARTIN, an individual, ) Case No.: 2:23-cv-01848-JAD-DJA  
Plaintiff, )  
vs. ) **STIPULATION TO EXTEND  
DISCOVERY PLAN AND  
SCHEDULING ORDER  
(FIRST REQUEST)**  
BJ'S RESTAURANT OPERATIONS )  
COMPANY, a domestic corporation; DOE )  
EMPLOYEES OF BJ'S RESTAUANT )  
BREWHOUSE, DOES 1-20; and ROE )  
BUSINESS ENTITIES 1-20. inclusive, )  
Defendants. )  
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 )

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The parties stipulate to extend the remaining deadlines in the Stipulated Discovery Plan and Scheduling Order by 60 days. This is the first request to extend the Stipulated Discovery Plan and Scheduling Order. This extension is requested to allow Plaintiff's counsel to take the deposition of Defendant's FRCP 30(b)(6) Witness. This extension will give the parties time to meet and confer regarding the topics and schedule the deposition. Defendant's counsel would also like to take the deposition of Plaintiff's expert Dr. Bady however, he is not available until August 20, 2024. Due to the 4<sup>th</sup> of July holiday and summer schedules Defendant's FRCP

1 30(b)(6) Witness's availability are limited as there may be multiple representatives assigned for  
2 certain topics.

3 **I. Discovery Completed**

4 The parties have exchanged written discovery in the form of interrogatories and requests for  
5 production of documents. The parties have taken depositions of the Plaintiff. Defendant has  
6 received records and imaging from all providers. The parties have exchanged expert disclosures  
7 and rebuttal expert disclosures.

8 **II. Discovery Remaining**

9 Plaintiff needs to take the deposition of Defendant's FRCP 30(b)(6) Witness and Defendant  
10 will be taking the deposition of Plaintiff's expert witness Dr. Bady on August 20, 2024.

11 **III. Why Discovery Has Not Been Completed**

12 Following the parties' exchange of rebuttal expert disclosures, the parties are working  
13 together to meet and confer as to the availability for Plaintiff to depose Defendant's FRCP  
14 30(b)(6) Witness as well as the topics contained in Plaintiff's Notice. Defendant will also be  
15 noticing the deposition of Plaintiff's Expert Dr. Bady, however, he is not available until August  
16 20, 2024. Due to summer schedules, including the 4<sup>th</sup> of July holiday, the parties and  
17 Defendant's representatives are understandably busier than usual. Additionally, multiple  
18 representatives may be required to appear for the topics and as such, the parties need to  
19 schedule the deposition for the availability of these individuals once the topics have been  
20 confirmed.

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1           **IV. Proposed Deadlines**

2           Close of Discovery: **September 14, 2024** (from July 16, 2024)

3           Dispositive Motion Deadline: **October 15, 2024** (from August 16, 2024)

4           Joint Pre-Trial Order: **November 15, 2024** (from September 16, 2024)

5           DATED THIS 3<sup>rd</sup> day of July 2024.

**HICKS & BRASIER, PLLC**

6           /s/ Betsy C. Jefferis-Aguilar

7           BETSY C. JEFFERIS-AGUILAR, ESQ.

8           *Attorneys for Plaintiff*

9           DATED 3<sup>rd</sup> day of July 2024.

**BACKUS | BURDEN**

10           /s/ Jacquelyn Franco, Esq.

11           Jack P. Burden, Esq.

12           Jacquelyn Franco, Esq.

13           *Attorneys for Defendant*

14           *BJ'S Restaurant Operations Company*  
*dba BJ's Restaurant*

15           **IT IS SO ORDERED.**



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17           United States Magistrate Judge

18           Dated: 7/3/2024